

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

CARMELO TREVISO, Individually and on
Behalf of All Others Similarly Situated,

Plaintiffs,

vs.

NATIONAL FOOTBALL MUSEUM, INC. dba
PRO FOOTBALL HALL OF FAME,

Defendants.

Civil Action No. 5:17-cv-00472

Judge Christopher A. Boyko

**NOTICE OF MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT,
AND FOR ATTORNEYS' FEES, COSTS, AND SERVICE AWARD**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on November 17, 2023, at 2:00 p.m. EST, at the Howard M. Metzenbaum U.S. Courthouse located at 201 Superior Avenue, Cleveland, Ohio 44114, East Chambers, Room 328, Plaintiff Carmelo Treviso, on behalf of himself and all others similarly situated ("Plaintiff"), by and through his undersigned counsel of record, will and does hereby move the Court pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, for the Court to grant final approval of the Class Action Settlement Agreement (the "Settlement") filed with the Court on June 19, 2023 (*see* ECF No. 181-1).

Specifically, Plaintiff and Defendant (the "Parties") respectfully request that the Court: (1) grant final approval of the Settlement, (2) certify the Settlement Class, (3) authorize CPT Group, Inc., the Settlement Administrator, to administer the settlement benefits and disburse payments as appropriate to members of the Class, and (4) enter the [Proposed] Final Settlement Order and Judgment concurrently filed herewith.

PLEASE TAKE FURTHER NOTICE that on November 17, 2023, at 2:00 p.m. EST, at the Howard M. Metzenbaum U.S. Courthouse located at 201 Superior Avenue, Cleveland, Ohio

44114, East Chambers, Room 328, Plaintiff, by and through his undersigned counsel of record, will and does hereby move the Court for an order pursuant to Rules 23(h) and 54(d) of the Federal Rules of Civil Procedure for the following relief:

1. An award to Ahmed Ibrahim and his firm AI Law, PLC, and Romney Cullers and his firm The Becker Law Firm, PA (“Class Counsel”) of \$187,500 in attorneys’ fees;
2. An award to Class Counsel of \$71,476.46 in litigation costs and expenses;
3. An award of \$100,000 in settlement and claims administration expenses to the Court-appointed Settlement Administrator, CPT Group, Inc. (“CPT”); and
4. A service award of \$5,000 to Plaintiff Carmelo Treviso.

This motion is based on the concurrently filed Memorandum in Support of Motion for Final Approval of Class Action Settlement, and for Attorneys’ Fees, Costs, and Service Award, the Declaration of Ahmed Ibrahim, the Declaration of Romney Cullers, the Declaration of Julie Green, the [Proposed] Final Settlement Order and Judgment, the previously filed Class Action Settlement Agreement (ECF No. 181-1) and Declaration of Carmelo Treviso (ECF No. 182-2), the pleadings and papers on file herein, and any other written and oral arguments that may be presented to the Court.

Respectfully submitted on this 20th day of October, 2023.

/s/ Romney Cullers

Romney Cullers (0053668)
THE BECKER LAW FIRM
1111 Superior Avenue East, Suite 400
Cleveland, Ohio 44114
Ph: (440) 323-7070
Fax: (440) 323-1879
rcullers@beckerlawlpa.com

/s/ Ahmed Ibrahim

Ahmed Ibrahim (*Pro Hac Vice*)
4695 MacArthur Court, Suite 1100
Newport Beach, CA 92660
Ph: (949) 266-1240
Fax: (949) 266-1280

Attorneys for Plaintiff and the Class

CERTIFICATE OF SERVICE

A copy of the foregoing was served upon the following this 20th day of October 2023 via electronic mail to:

Scott M. Zurakowski
Krugliak Wilkins Griffiths
& Dougherty – Canton
4775 Munson Street, NW
Canton, OH 44718
szurakowski@kwgd.com

Counsel for Defendant National Football
Museum, Inc. dba Pro Football Hall of Fame

/s/ Ahmed Ibrahim
Ahmed Ibrahim, Esq.